

Vitamins

Herbs



Food

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March 15, 2005

Food and Drug Administration  
Center for Food Safety and Applied Nutrition  
Office of Nutritional Products, Labeling, and Dietary Supplements  
Division of Nutritional Programs and Labeling  
200 C Street SW  
Washington, DC 20204

Re: 21 U.S.C. Section 343(r)(6), Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Astragalus Extract, 500 mg VCaps, a dietary supplement.

Statements being made in the labeling of Astragalus Extract, 500 mg VCaps:

- (1) For more than 2000 years, Chinese herbalists have valued Astragalus for its adaptogenic properties, as well as for its ability to tonify the body's "vital force" known as the *Qi*. More recently, Astragalus has been found to support healthy immune function through numerous mechanisms. Non-clinical studies using Astragalus have demonstrated its ability to stimulate the production of and increase the activity of specialized white blood cells, such as T-Cells and Natural Killer Cells. Astragalus has also been studied for its role in the support of healthy liver and vascular function. Herbalists recommend the use of Astragalus both seasonally and year-round to support a healthy immune system.

To the best of my knowledge, and based upon information and belief present at the time of the executing of this notice, I certify that the above information is accurate and complete. NOW Foods possesses substantiation that the statements are truthful and not misleading.

Michael Lelah, Ph.D.  
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*Michael Lelah*

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